

TIME RECEIVED
February 21, 2022 at 11:21:55 AM EST

REMOTE CALL

DURATION
128

PAGES
3

STATUS
Received

02/21/2022 12:27 FAX

0001/0003

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FILE NUMBER: 4065-123597

DATE: February 21, 2022

FROM: Nicholas A. Cummins

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<u>Attention:</u>	<u>Company:</u>	<u>Facsimile No:</u>
Honorable John Milton Younge	USDC, Eastern District of Pennsylvania	(267) 299-7368

Number of Pages (including cover sheet): 3

<p>Message: Theophalis Wilson v. City of Philadelphia, et al. U.S.D.C., Eastern District of PA, No. 21-cv-2057</p>
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February 21, 2022

VIA FACSIMILE

Honorable John Younge
James A. Byrne U.S. Courthouse
601 Market Street, Room 4007
Philadelphia, PA 19106

RE: Theophalis Wilson v. City of Philadelphia, et al.
U.S.D.C., Eastern District of PA, No. 21-cv-02057
Our File No. 4065-123597

Dear Judge Younge:

I have recently been retained to represent defendants, Frank Jastrzembski and Manuel Santiago in this matter. Enclosed for the Court's approval is a proposed stipulation extending the time for my clients to respond to the amended complaint to March 3, 2022. If it meets with the Court's approval, I would respectfully request that the Court execute the stipulation and have it filed of record.

Thank you for your consideration of this matter.

Respectfully yours,



Nicholas A. Cummins

NAC/amp

Enclosure

cc: *Via Email (w/enc.)* –
Kimberly K. Winter, Esquire
Danielle Walsh, Esquire
Joseph J. Santarone, Esquire

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THEOPHALIS (BINKY) WILSON	:	
v.	:	
CITY OF PHILADELPHIA, PENNSYLVANIA,	:	NO: 21-cv-02057-JMY
et al.	:	

STIPULATION FOR EXTENSION TO RESPOND TO COMPLAINT

AND NOW, on this 18th day of February, 2022, it is hereby STIPULATED and AGREED by the undersigned counsel on behalf of their respective clients that the time for **defendants, Frank Jastrzembski and Manuel Santiago**, to answer or otherwise respond to the amended complaint is extended to **March 3, 2022**.

LATHROP GPM LLP

/s/ Kimberly K. Winter
KIMBERLY K. WINTER
Attorney for Plaintiff,
Theophalis Wilson

**CITY OF PHILADELPHIA LAW
DEPARTMENT**

/s/ Danielle Walsh
DANIELLE WALSH
Attorney for Defendants,
City of Philadelphia, Frank Margerum,
Richard Harris, and Kevin Hollinshead

BENNETT, BRICKLIN & SALTZBURG LLC

/s/ Nicholas A. Cummins
NICHOLAS A. CUMMINS
Attorney for Defendants,
Frank Jastrzembski and Manuel Santiago

**MARSHALL DENNEHY WARNER
COLEMAN & GOGGIN**

/s/ Joseph J. Santarone
JOSEPH J. SANTARONE
Attorney for Defendants,
Lynne Abraham and David Desiderio

Approved and So Ordered,

BY THE COURT:

John M. Younge, U.S.D.J.

Date: _____